



**McGregor W. Scott**  
United States Attorney  
Eastern District of California

*Sacramento*  
501 I. Street, Ste 10-100  
Sacramento CA 95814  
(916) 554-2700

**NEWS RELEASE**

*Fresno*  
1130 O. Street, Rm 3654  
Fresno, CA 93721  
(559) 498-7272

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Contact: Patty Pontello, 916-554-2706  
<http://www.usdoj.gov/usao/cae/home/>

**STOCKTON MAN AND WOMAN INDICTED FOR OPERATION OF  
MILLION DOLLAR ILLEGAL MONEY REMITTER BUSINESS  
AND STRUCTURING OF BUSINESS FUNDS**

SACRAMENTO--United States Attorney McGregor W. Scott announced today that SEREY VAN, age 31, and THANH TAN VAN, aka THOMAS VAN, age 40, both of Stockton, California, were indicted by a federal grand jury in Sacramento for their involvement in a large-scale illegal money remitter business, and a conspiracy to structure approximately \$850,000 in revenues, much of it associated with the illegal business.

The case is the product of an extensive investigation undertaken by the Internal Revenue Service - Criminal Investigation Division.

According to Assistant United States Attorneys S. Robert Tice-Raskin and Courtney J. Linn, who are prosecuting the case, the grand jury returned a twelve-count indictment against both defendants, charging them with a conspiracy to structure financial transactions (one count as to both defendants), conducting an illegal money transmitting business (one count as to both defendants), five counts of structuring financial transactions at a financial institution for the purpose of evading the currency transaction reporting requirement (two counts as to SEREY VAN, and three counts as to THOMAS VAN), and five counts of causing or attempting to cause a domestic financial institution to fail to file required currency transaction reports with the purpose of evading the currency transaction reporting requirement (one count as to both defendants, two counts as to THOMAS VAN, and two counts as to SEREY VAN).

Under federal law, it is illegal to operate a money transmitting business, that is, a business that engaged in transferring funds by wire to locations in this country or locations abroad, if the business was operated without an appropriate California state license or the business failed to comply with federal registration requirements.

According to the indictment, during the period from approximately April 2004, through January 2005, defendants SEREY VAN and THOMAS VAN controlled, conducted, and operated Best Money Express and March Lane Pure Water as money transmitting businesses, and transmitted over \$1 million by wire for customers from the United States to Cambodia, without complying with California licensing requirements or federal registration requirements.

Under federal law, financial institutions are required to prepare and file Currency Transaction Reports ("CTRs") to report large cash transactions over \$10,000. It is a crime to structure transactions with financial institutions, that is, to break transactions into amounts at or under \$10,000, with the intent of evading the CTR filing requirement. It is also a crime to cause or attempt to cause a financial institution to fail to file a CTR, with the intent of evading the CTR filing requirement.

According to the indictment, during the course of the conspiracy, defendants SEREY VAN and THOMAS VAN made an aggregate total of approximately \$850,000.00 in deposits in their bank accounts at Bank of America and Wells Fargo Bank in amounts at or under \$10,000 with the purpose of evading the CTR filing requirement. Sometimes, for the purpose of evading the CTR reporting requirement, defendants made multiple deposits, each slightly under \$10,000, at different branches of the same bank on the same day, thereby causing or attempting to cause the financial institution to fail to file a CTR report. Other times, for the purpose of evading the CTR reporting requirement, defendants structured transactions in a variety of ways: a) by making a single deposit, just slightly under \$10,000, on one day at one bank branch; b) by making multiple deposits, each slightly under \$10,000, at the same bank branch on successive days; or c) by making multiple deposits, each slightly under \$10,000, at completely different banks on the same day. To avoid scrutiny by the financial institutions to which the deposits were made, the defendants repeatedly shifted their activity from one financial institution to another, and from one account to another.

Defendants' appearance in connection with these charges is tentatively scheduled for September 1, 2005 at 2:00 p.m.

Under the indictment, each defendant faces a maximum penalty of up to five years imprisonment and a fine of \$250,000 for the conspiracy count, up to five years imprisonment and a fine of \$250,000 for the illegal money remitter count, and up to 10 years imprisonment and a fine of \$500,000 for each count of either structuring or causing a financial institution to fail to file a CTR report. If convicted, defendants' sentence will ultimately be determined by a sentencing court after consideration of the appropriate U.S. Sentencing Guidelines.

The United States Attorney's Office notes that the indictment contains accusations only against the defendants, and that the defendants are presumed innocent until and unless proven guilty beyond a reasonable doubt.

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